



STEIN | SAKS, PLLC

YAAKOV SAKS▲.\*

JUDAH STEIN▲.

ELIYAHU BABAD▲.

MARK ROZENBERG.

TAMIR SALAND.

HASAN SIDDIQUI▲

RAMI SALIM▲.

▲ NJ Bar Admissions

▪ NY Bar Admission

\*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | www.steinsakslegal.com

May 15, 2024

**Via CM/ECF**

The Honorable Cheryl L. Pollak  
United States District Court  
Eastern District of New York

RE: *Hernandez v. Franco's Fashion, Inc.*  
Case No.: 1:23-cv-09355-LDH-CLP

Dear Judge Pollak:

Plaintiff submits this status report pursuant to the Order of May 6, 2024.

Defendant and Plaintiff's counsel are engaged in negotiations to resolve this matter, which we are hopeful will be productive. Plaintiff respectfully requests 30 additional days to conclude these negotiations before Plaintiff is required to move for a default judgment.

We thank the Court for its kind consideration and courtesies.

Respectfully Submitted,

/s/ Mark Rozenberg

By: Mark Rozenberg, Esq.